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July 12, 2012

### VIA FACSIMILE

The Honorable Joseph A. Dickson, U.S.M.J.  
U.S. Post Office & Courthouse Bldg.  
Federal Square Newark, NJ 07101

**Re: Montvale Surgical Center v. Horizon Blue Cross Blue Shield of New Jersey  
Civil Action No. 12-2908(CCC)**

Dear Judge Dickson:

Please be advised that my firm represents Horizon Blue Cross Blue Shield of New Jersey ("Horizon") in the above captioned matter. Currently, there is a scheduling conference set for Wednesday, July 18, 2012 in front of your Honor. I write to request an adjournment of this scheduling conference in light of a motion to consolidate recently being filed in which Horizon is seeking to consolidate this matter with seven (7) other nearly identical actions. This motion to consolidate was filed under docket number 12-2374-WJM-MF. The motion to consolidate is returnable on July 16, 2012.

I respectfully request that the scheduling conference for Wednesday, July 18, 2012, be adjourned until after disposition of the motion to consolidate. Should the motion to consolidate be granted, the discovery schedule for this matter would then be obsolete. I believe the time and resources of both the Court, and the parties in this matter, would be best preserved by adjourning this conference until after the motion to consolidate is decided.

The Honorable Joseph A. Dickson, U.S.M.J.  
July 12, 2012  
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Respectfully,

**CONNELL FOLEY LLP**



Matthew A. Baker

MAB/meb

cc: Andrew Bronsnick, Esq. (via e-mail)